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6 MARGIE SAN DIEGO

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8 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
9 A Limited Liability Partnership  
10 Including Professional Corporations  
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18 WELLS FARGO BANK, N.A.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

18 MARGIE SAN DIEGO

19 Plaintiff,

20 v.

21 WELLS FARGO BANK, N.A.,

22 Defendants.

23 Case No. 3:14-cv-03211 JCS

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**AMENDED  
STIPULATION AND ~~PROPOSED~~ ORDER  
TO CONTINUE DEADLINES**

1       1. On January 27, 2014, the Court issued a Pretrial Order setting the deadline to  
 2 complete private ADR on March 27, 2015 and set a Further Case Management Conference for May  
 3 21, 2015.

4       2. The parties are attempting in good faith to resolve this matter and have agreed to  
 5 mediate the case with the Honorable Ellen James of JAMS. Due to defense counsel's trial schedule,  
 6 the parties need additional time to mediate and have scheduled mediation for **June 23, 2015**.

7       3. The parties agree that judicial economy is served by continuing the current mediation  
 8 completion deadline to **June 23, 2015** and continuing the Further Case Management Conference to  
 9 **July 20, 2015**, or a date thereafter that is convenient for the Court.

10       4. The parties have also agreed on a limited discovery plan prior to mediation. Since the  
 11 current fact discovery cut-off date is July 27<sup>th</sup>, 2015, in the event the case does not settle at  
 12 mediation, the parties anticipate requiring more time to complete discovery and other case matters.  
 13 Thus, the parties propose the following extensions to the deadlines set by the Court's October 30,  
 14 2014 Pretrial Order:

	Current Deadline	Proposed Deadline
Deadline to Complete ADR	March 27, 2015	June 23, 2015
Further Case Management Conference	May 21, 2015	<del>July 20, 2015</del> <b>July 30, 2015</b>
Fact Discovery Cut-off	July 27, 2015	September 11, 2015
Expert Witness Disclosures	August 24, 2015	September 25, 2015
Rebuttal Expert Disclosures	September 7, 2015	October 2, 2015
Deadline to Hear Dispositive Motions	September 24, 2015	October 16, 2015

27       5. The parties do not propose any extensions to the current trial date or any of the  
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1 pretrial deadlines set by the Court in the October 30, 2014 Pretrial Order.

2 6. THEREFORE, the parties hereto stipulate and agree, and request, that the Court enter  
3 an Order continuing deadlines as proposed in the table above.

4 **IT IS SO STIPULATED.**

5 DATED: March 25, 2015

6 \_\_\_\_\_/P. Bobby Shukla \_\_\_\_\_  
7 P. Bobby Shukla  
8 Law Offices of Stephen M. Murphy  
9 Attorneys for Plaintiff

10 DATED: March 25, 2015

11 \_\_\_\_\_/Ellen M. Bronchetti \_\_\_\_\_  
12 Ellen M. Bronchetti  
13 Sheppard, Mullin, Richter & Hampton LLP  
14 Attorneys for Defendant

15 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

16 DATED: March 26, 2015

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18 Jacqueline Scott Corley  
19 United States Magistrate Judge  
20 Jacqueline Scott Corley  
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